



February 21, 2020

**VIA ECF**

Judge Pamela K. Chen  
United States District Court  
Eastern District of New York  
220 Cadman Plaza East  
Brooklyn, New York 11201  
Courtroom 4F

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Re: United States v. Alejandro Burzaco, 15-cr-252 (PKC) (RML)  
Request from Third Party Petitioner Full Play Group S.A. to Appear as Interested Party

Judge Chen:

Norton Rose Fulbright US LLP represents Full Play Group S.A. ("FPG"), an entity incorporated in Uruguay. We write to respectfully request that the Court add FPG as an interested third party to the forfeiture proceedings relating to Alejandro Burzaco by the U.S. Attorney General's Office of the Eastern District of New York (the "Government").

On December 2, 2015, this Court entered a Preliminary Order of Forfeiture for certain monies and assets. Among the assets subject to the order of forfeiture are: "Any and All [sic] funds on deposit in Bank Hapoalim Account no. CH040828170441801000U held in the name of Datisa S.A. ['Datisa'], and all proceeds traceable thereto [the 'Account']." FPG, along with Traffic Group ("Traffic") and Torneos Y Competencias S.A. ("Torneos"), are joint venture members in Datisa, a Uruguayan corporate entity and the owners of the Account. The Government sent a letter dated January 21, 2020 via FedEx addressed to Datisa in Uruguay attaching the Preliminary Order of Forfeiture, which provides that any person asserting a legal interest in the forfeited assets may petition the Court for a hearing. Accordingly, yesterday, FPG filed a Verified Petition, asserting its legal interest in the Account, and concurrently a Motion to Stay. We respectfully ask that the Court grant FPG's request to appear on the Court's docket as a third party in the above-referenced action.<sup>1</sup> A courtesy copy of our filings (D.E. 1309) has been delivered to the Court earlier today.

We remain at Your Honor's disposition should you have any questions or concerns.

Respectfully,

/s/ Carlos F. Ortiz  
Carlos F. Ortiz

<sup>1</sup> Unable to add ourselves to the Court's docket without leave, our filing was made using the Letter filing event on the docket. We understand that after the Court approves FPG being added as a third party to this action, the Clerk will be able to make the administrative adjustment to add FPG on the Court's docket and we will file a notice of appearance.

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Encl.  
CC: All Counsel via ECF  
CFO/MCB: